

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

TREYNOR HATCHER

*

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VS.

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CA NO. 2:17-CV-155

*

NUECES COUNTY, TEXAS, et al. *

THE ORAL DEPOSITION OF

CHARLES HATCHER

November 16, 2017

A P P E A R A N C E S

ATTORNEY FOR TREYNOR HATCHER:

MR. CHRISTOPHER GALE
Gale Law Group, PLLC
711 N. Carancahua, Suite 514
Corpus Christi, Texas 78401

ATTORNEYS FOR NUECES COUNTY, TEXAS, et al.:

MR. JEFFREY R. PRUITT
MS. JENNY C. CRON
Assistant Nueces County Attorneys
901 Leopard Street, Room 207
Corpus Christi, Texas 78401

REPORTED BY: REBECCA A. HINOJOSA, C.S.R.

Charles Hatcher

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<p>1 IN THE UNITED STATES DISTRICT COURT 2 FOR THE SOUTHERN DISTRICT OF TEXAS 3 CORPUS CHRISTI DIVISION</p> <p>4 TREYNOR HATCHER * 5 VS. * CA NO. 2:17-CV-155 6 NUECES COUNTY, TEXAS, et al. *</p> <hr/> <p>7 THE ORAL DEPOSITION OF 8 CHARLES HATCHER 9 November 16, 2017</p> <hr/> <p>11 APPEARANCES</p> <p>12</p> <p>13 ATTORNEY FOR TREYNOR HATCHER: 14 MR. CHRISTOPHER GALE 15 Gale Law Group, PLLC 16 711 N. Carancahua, Suite 514 Corpus Christi, Texas 78401</p> <p>17 ATTORNEYS FOR NUECES COUNTY, TEXAS, et al.: 18 MR. JEFFREY R. PRUITT 19 MS. JENNY C. CRON 20 Assistant Nueces County Attorneys 21 901 Leopard Street, Room 207 Corpus Christi, Texas 78401</p> <p>22 REPORTED BY: REBECCA A. HINOJOSA, C.S.R. 23 24 25</p>	<p>1 THE ORAL DEPOSITION OF THE WITNESS, CHARLES 2 HATCHER, was taken by Ms. Jenny Cron before me REBECCA 3 A. HINOJOSA, a Certified Shorthand Reporter in and for 4 the State of Texas, on the 16th day of November, 2017, 5 between the hours of 1:04 p.m. and 1:45 p.m., at the 6 offices of Gale Law Group, PLLC, 711 N. Carancahua, 7 Suite 514, Corpus Christi, Nueces County, Texas, 8 pursuant to the Rules and the following stipulations 9 and agreements of counsel, to-wit:</p> <p>10 It is stipulated and agreed by and between 11 counsel and the respective parties hereto that the 12 deposition of the witness named in the caption hereto 13 may be taken at this time and place pursuant to 14 agreement, and that the said deposition or any part 15 thereof, when so taken, may be used on the trial of 16 this cause the same as if the witness were present in 17 Court and testifying in person. 18 19 20 21 22 23 24 25</p>
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<p>1 INDEX TO TESTIMONY 2 PAGE</p> <p>3 Examination of CHARLES HATCHER: 4 By Mr. Pruitt. 4</p> <p>5</p> <p>6 EXHIBIT INDEX 7 PAGE</p> <p>8 Exhibit No. 1 Phone records 14 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p>1 CHARLES HATCHER, 2 the witness, having been first duly cautioned and sworn 3 to tell the truth, the whole truth and nothing but the 4 truth, testified as follows, to wit:</p> <p>5</p> <p>6 EXAMINATION</p> <p>7</p> <p>8 BY MS. CRON:</p> <p>9 Q All right. Good afternoon, Mr. Hatcher. My 10 name is Jenny Cron and I'm an Assistant County 11 Attorney. With me is Jeffrey Pruitt, he's also an 12 Assistant County Attorney, and we're here today 13 representing Nueces County in this, and then, I guess, 14 John and Jane Doe in this lawsuit.</p> <p>15 This is a deposition in which I will ask 16 you questions, and you must answer them truthfully. 17 Although there's not a judge present, this is a formal 18 legal proceeding just like testifying in court, and you 19 are under the same obligation to tell the truth, the 20 whole truth, and nothing but the truth. If you do not 21 understand any of my questions, please just ask me to 22 repeat them or if you don't recall, just say, "I don't 23 recall."</p> <p>24 Before the deposition can be used in 25 court, you will have the opportunity to read over it</p>

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<p>1 and correct any mistakes.</p> <p>2 Do you have any questions for me or do you</p> <p>3 understand?</p> <p>4 A Pretty much understand.</p> <p>5 Q Okay. And just the other thing is just</p> <p>6 because we do have a court reporter here, just to</p> <p>7 answer verbally and not with nods of the head or</p> <p>8 uh-huhs or something like that.</p> <p>9 A I will.</p> <p>10 Q It's just important for the record.</p> <p>11 Will you just state your full legal name</p> <p>12 for the record, please.</p> <p>13 A Charles Phillip Hatcher.</p> <p>14 Q Okay. And what's your date of birth?</p> <p>15 A 10/17/1964.</p> <p>16 Q Okay. And how long have you lived in the</p> <p>17 Corpus Christi area?</p> <p>18 A Thirty years minus 14 months.</p> <p>19 Q Okay. And what is your current address?</p> <p>20 A 2430 Lorine Drive, Corpus Christi, Texas.</p> <p>21 Q Okay. And how long have you resided at that</p> <p>22 address?</p> <p>23 A Approximately ten years.</p> <p>24 Q Okay. And can you tell me who currently</p> <p>25 resides in your household by name?</p>	<p>1 Was this --</p> <p>2 A I'm not sure of the number. It was -- it's</p> <p>3 Ms. Klein's court now.</p> <p>4 Q Okay. So it was a result of your divorce with</p> <p>5 his biological mother, or --</p> <p>6 A No. No. It was a result of the judge putting</p> <p>7 him on an ankle monitor.</p> <p>8 Q Oh, Okay. Okay. So in regards to his -- his</p> <p>9 criminal case?</p> <p>10 A Uh-huh.</p> <p>11 Q Okay. And how long was he residing with your</p> <p>12 friend, Mr. Griffin?</p> <p>13 A I believe it was about a month.</p> <p>14 Q Okay. What is the highest level of education</p> <p>15 you've completed?</p> <p>16 A Some college.</p> <p>17 Q Okay. And are you currently employed?</p> <p>18 A I am.</p> <p>19 Q Okay. Where do you work?</p> <p>20 A I'm a contractor for Customs and Border</p> <p>21 Protection out at the base.</p> <p>22 Q Okay. And how long have you been working</p> <p>23 there?</p> <p>24 A Thirty years.</p> <p>25 Q Okay. And what do you do exactly for them?</p>
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<p>1 A Myself, Janet Hatcher, my wife, my youngest</p> <p>2 daughter Emily Kortz, my middle son, or youngest son,</p> <p>3 Destynn Hatcher and Treynor Hatcher.</p> <p>4 Q Okay. And do you have other children living</p> <p>5 outside the home?</p> <p>6 A Several, yes, ma'am.</p> <p>7 Q Okay. And can you just identify those, as</p> <p>8 well?</p> <p>9 A J.C. Slovich, Brodie Hatcher, Connor Hatcher,</p> <p>10 Margery Hoch, Tabitha Hoch, Rebecca Hoch, Anna Hoch. I</p> <p>11 think that's all of them.</p> <p>12 Q Okay.</p> <p>13 A Oh, Wesley -- Wesley Hoch.</p> <p>14 Q Okay. And so currently Treynor is -- is</p> <p>15 residing in your house?</p> <p>16 A Yes.</p> <p>17 Q And how -- has he been living with you for</p> <p>18 several years, or --</p> <p>19 A Yes.</p> <p>20 Q -- has that been interrupted at anytime in the</p> <p>21 past, let's say five years?</p> <p>22 A Interrupted after court where the judge</p> <p>23 wouldn't let him stay in the house. He stayed with my</p> <p>24 retired sheriff buddy Blaire Griffin.</p> <p>25 Q Okay. And which court are you referring to?</p>	<p>1 A I'm an aircraft mechanic.</p> <p>2 Q Okay. Prior to today and -- who have you</p> <p>3 talked to about this lawsuit, whether it's been family,</p> <p>4 friends, you know, who -- who have you talked to about</p> <p>5 this current lawsuit that we're here for today?</p> <p>6 A I think -- as far as the lawsuit?</p> <p>7 Q Yes. Just anything about it.</p> <p>8 A I haven't really talked to anybody about the</p> <p>9 lawsuit.</p> <p>10 Q Okay. You haven't talked to your wife or, I</p> <p>11 mean, just --</p> <p>12 A Just -- just that there's a lawsuit, I mean,</p> <p>13 but not talk about it.</p> <p>14 Q Right. Okay.</p> <p>15 A Yeah.</p> <p>16 Q So no friends -- no -- no other -- no other</p> <p>17 friends about it, or --</p> <p>18 A My buddy Blaire Griffin --</p> <p>19 Q Okay.</p> <p>20 A -- knows -- knows and my parents know.</p> <p>21 Q Okay. Let's talk about Treynor a minute.</p> <p>22 What medical diagnosis does Treynor have?</p> <p>23 A He has Asperger's autism and ADD.</p> <p>24 Q Okay. And when was he diagnosed? When --</p> <p>25 when was he first diagnosed?</p>

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<p>1 A Early -- early on. I'm not sure what age.</p> <p>2 Q Okay. But when he was more like a toddler?</p> <p>3 A Seven -- seven, eight years old-ish.</p> <p>4 Q Okay. What -- what -- your -- did his</p> <p>5 pediatrician make that referral for diagnosis, or</p> <p>6 who first, you know, made an observation that maybe he</p> <p>7 needed to be --</p> <p>8 A I -- I think it was me. He was reading at an</p> <p>9 early age, and I asked the pediatrician about it, but</p> <p>10 I'm not sure if that was referred or not.</p> <p>11 Q Okay.</p> <p>12 A Dr. Deline has been seeing him since he was</p> <p>13 young.</p> <p>14 Q Okay. Yes. That was one of the questions I</p> <p>15 was going to ask.</p> <p>16 And Dr. Deline, what's her first name?</p> <p>17 A I believe it's Carol.</p> <p>18 Q Okay.</p> <p>19 A I call her Dr. Deline. I'm not sure.</p> <p>20 Q Okay. And is she a neurologist?</p> <p>21 A I'm not sure of that either.</p> <p>22 Q Okay.</p> <p>23 A Neurosurgeon, neurologist, something like</p> <p>24 that.</p> <p>25 Q Okay.</p>	<p>1 your -- in your layman's terms of what, you know, goes</p> <p>2 on with -- with Treynor, what do you see -- you know,</p> <p>3 what does he exhibit with his autism?</p> <p>4 A He's less hyperactive when he's on the</p> <p>5 medication.</p> <p>6 Q Okay.</p> <p>7 A I'm not sure how to -- to state it, but he's</p> <p>8 more with it on it. I mean, he gets -- when he's not</p> <p>9 on the medication, he's kind of story telling, I mean,</p> <p>10 just way out there. Like -- it -- it's hard to</p> <p>11 explain. It's like -- it's just hard to explain. It's</p> <p>12 stories that -- just don't relate to real world type</p> <p>13 stuff.</p> <p>14 Q Okay. So --</p> <p>15 A Like more of a game.</p> <p>16 Q Okay. Yeah. And I don't want to put words in</p> <p>17 your mouth, but like fantasies or --</p> <p>18 A No. It's -- I would say it was fantasy if he</p> <p>19 was telling a story like that, but it's not like that.</p> <p>20 Q Okay. What do you mean? I mean, you did say</p> <p>21 more like a game. Like, what do you --</p> <p>22 A Well, just -- like I said, it's hard to</p> <p>23 explain, but he'll sit there and start and then be over</p> <p>24 here with something else. It's not really an</p> <p>25 explainable thing unless you experience it.</p>
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<p>1 A I'm not sure what her...</p> <p>2 Q And so Dr. Deline was the -- the physician</p> <p>3 that diagnosed him as having Asperger's?</p> <p>4 A She is the one that has been treating him.</p> <p>5 I'm not sure who diagnosed him.</p> <p>6 Q Okay. Okay. And when you say treating him,</p> <p>7 what is -- what does she do? Does she schedule regular</p> <p>8 appointments with him? Does she --</p> <p>9 A Yes, ma'am.</p> <p>10 Q -- prescribe medication?</p> <p>11 A Yes, ma'am.</p> <p>12 Q Okay. And so what medications does Treynor</p> <p>13 take?</p> <p>14 A He's taking Ritalin, Remeron, Clonidine. I'm</p> <p>15 not sure what else.</p> <p>16 Q Okay. And -- and as far as you know, those</p> <p>17 are specific to address his -- what -- I mean, what are</p> <p>18 those supposed to address for him, those medications?</p> <p>19 Has Dr. Deline told you, like, why does he need to take</p> <p>20 those?</p> <p>21 A Specifically medications, I don't know, but I</p> <p>22 know it's to treat the ADD and the Asperger's autism.</p> <p>23 Q Okay. And I'm somewhat familiar with, you</p> <p>24 know, what ADD stands for, I mean, so would you say</p> <p>25 it's to help him focus, or what is -- I mean, in</p>	<p>1 Q Okay. Is he capable of understanding right</p> <p>2 from wrong?</p> <p>3 A I believe so, yes.</p> <p>4 Q Okay. And I have heard the terminology, and I</p> <p>5 think it's in Treynor's pleadings in this case, that</p> <p>6 he's a highly functional, you know, autistic. What</p> <p>7 does that mean to you? Have you heard that term used</p> <p>8 in regards to him?</p> <p>9 A Yes.</p> <p>10 Q Okay. And what -- what does that mean to you?</p> <p>11 A It means he's able to go to school, he's -- he</p> <p>12 is more social than he was as a kid, so that type of</p> <p>13 stuff, but then he has trouble, like, riding a bike or</p> <p>14 tying his shoes, that type of stuff.</p> <p>15 Q Okay. And even before he graduated from high</p> <p>16 school last year he was taking college courses; is that</p> <p>17 right?</p> <p>18 A He started on a college course, he never did</p> <p>19 finish it. He was in that program.</p> <p>20 Q Okay. So has -- is he able -- does he make</p> <p>21 good grades in school?</p> <p>22 A He made fair grades in school. He's making,</p> <p>23 right now what he tells me, A's in college. He's got</p> <p>24 four classes, --</p> <p>25 Q Right.</p>

1 **A -- but I haven't seen none of the transcripts.**
 2 Q Okay. Talking again about what's been pled
 3 in -- in this particular case, in the pleadings it's
 4 **alleged that you -- you contacted the jail to let them**
 5 **know that your son required certain medications; --**
 6 **A I did.**
 7 Q -- is that right?
 8 **A That's correct.**
 9 Q Okay. And was that the only reason you called
 10 the jail?
 11 **A I called the jail to ask them if they could**
 12 **put him in isolation. I didn't know whether -- they**
 13 **didn't say he was in isolation or not. I told them**
 14 **that he was Asperger's autistic and I asked them if I**
 15 **could bring his medication up there. I was told I**
 16 **wasn't allowed to bring any medication. I called again**
 17 **and asked if I could bring medication. I was told that**
 18 **they had a nurse there. I asked if I could talk to**
 19 **her. The nurse told me, "You don't need to bring the**
 20 **medications. We have them here," if that was a nurse.**
 21 **I'm not sure it was a nurse.**
 22 Q Okay. Do you have any idea who you talked to
 23 when you --
 24 **A I -- I didn't write any names down.**
 25 Q Okay. Do you know if it was a male or a

1 female by the voice, or do you recall?
 2 **A I'm recalling females, mostly.**
 3 Q Okay. And you've brought today -- did you --
 4 were you served with a subpoena --
 5 **A Yes.**
 6 Q Okay.
 7 -- to bring some records today, some phone
 8 records?
 9 **A Yes.**
 10 Q Okay. And I have been provided some documents
 11 here that look like they're a printout from your Sprint
 12 cell phone records. Is -- would you agree, are these
 13 records you brought here? And I'm going to --
 14 **A Yes, ma'am. That's correct.**
 15 Q -- mark this as Exhibit 1.
 16 (WHEREUPON EXHIBIT NO. 1 WAS MARKED.)
 17 Q (By Ms. Cron) I -- I've gone ahead and turned
 18 to -- I think I counted the pages. They're not -- I
 19 don't think they're numbered, but I think it's the
 20 fifth page where it loose like some -- some numbers
 21 have been, you know, high --
 22 **A Highlighted.**
 23 Q -- highlighted. So would you identify what
 24 those highlighted -- what that -- those are, or what --
 25 what did those --

1 **A What I did was --**
 2 Q -- represent?
 3 **A -- what I did was look up the jail's number**
 4 **when I got the records here and highlighted what, on my**
 5 **phone, showed me what the jail's number was as of last**
 6 **week, and that's the ones I highlighted on there.**
 7 Q Okay. So looking at this, it looks like on
 8 September 25th at 4:04 p.m. and then again at 5:36 p.m.
 9 you made a phone call to the jail each showing for one
 10 minute. Is that what -- would you agree with that?
 11 **A That's what it says on the record, yes, ma'am.**
 12 Q Okay. And then I am just going to walk you
 13 through each one so we can again put this on the
 14 record. So on the 26 -- September 26th I see that at
 15 5:39 a.m. a phone call was made to that same number,
 16 which is -- I'll also read that into the record -- it's
 17 361-887-2307, and that was -- phone call was for two
 18 minutes; is that right?
 19 **A That's what it states, yes, ma'am.**
 20 Q Okay. And then on the following page there's
 21 a couple more entries that you've highlighted for that
 22 same phone number on the 26th for 7:17 p.m., 7:33 p.m.
 23 and 8:01 p.m., the first at 7:17 being for ten minutes,
 24 the following being at 7:33 for two minutes, and then
 25 the one at 8:01 p.m. for three minutes; is that right?

1 **A That's what it states, yes, ma'am.**
 2 Q Okay. And then September 27th I see two
 3 entries that are marked, one at 3:10 p.m. for that same
 4 phone number for three minutes and then additionally at
 5 5:50 p.m., same phone number, for two minutes; is that
 6 correct?
 7 **A That's what it shows, yes, ma'am.**
 8 Q Okay. And then turning the page for the date
 9 of September 28th you've also marked two entries, one
 10 at 5:25 p.m. for that same phone number for one minute
 11 and then again at 8:26 p.m. that same phone number for
 12 one minute.
 13 **A And I missed one here at 6:23 p.m. that I did**
 14 **not mark for one minute.**
 15 Q Okay. Okay. And so -- and I'm going to go
 16 back because I want to talk to you about before he got
 17 incarcerated, but I did want to go ahead and touch on
 18 these phone records, but -- so you didn't really --
 19 have already mentioned that you called because you
 20 asked about putting him in isolation, if that was
 21 possible, and then about providing his medication.
 22 There's several, obviously, we've gone through. Let's
 23 see. How many in total? One, 2, 3, 4, 5, 6, 7, 8, 9,
 24 10, 11 times. I count 11 times, it looks like, you
 25 either -- I'm not sure -- on these entries where it

1 says that -- that the phone call was for one minute, do
 2 you recollect whether you actually were able to talk to
 3 someone, or whether that was like a busy signal, or --
 4 because one minute to me doesn't sound too incredibly
 5 long. Do you recall?
 6 **A I -- I'm not sure whether they answered or**
 7 **not. I do know that they were very short, very curt**
 8 **calls on the other line, no matter who it was that**
 9 **answered the phone.**
 10 Q Okay. Were they able to confirm with you
 11 about your son being incarcerated there?
 12 **A Yes.**
 13 Q I mean -- Okay. So these 11 entries that you
 14 indicate reflect your phone calls to the Nueces County
 15 jail, do you remember anymore specifics? I mean, did
 16 you -- I mean, what you've identified is what you've
 17 told them. Do you remember specific conversations in
 18 addition to asking them about the medications? Was
 19 there anything else that you talked to them about on
 20 these 11 occasions?
 21 **A I -- I'm not sure of anything specific. I was**
 22 **panicky. My 17-year-old son was in jail where he**
 23 **didn't belong. I was trying to get my point across to**
 24 **people.**
 25 Q Did you relate to them, when you called, that

1 your son had Ausberger's [sic]?
 2 **A Yes, I did.**
 3 Q Okay.
 4 **A Asperger's, yes, ma'am.**
 5 Q I'm sorry. I probably am not pronouncing it
 6 right.
 7 **A I might have just said autistic. I'm not sure**
 8 **of the wording, --**
 9 Q Okay.
 10 **A -- but, yeah, that was relayed to them.**
 11 Q Okay. And -- and when -- do you recall when
 12 that was that you told them? Which date --
 13 **A I'm not sure which --**
 14 Q -- which day it --
 15 **A -- which phone call with any of this**
 16 **information, ma'am.**
 17 Q Okay.
 18 **A Which phone call, what was said, I'm not sure.**
 19 Q Okay. So you're not sure how -- whether it
 20 was the -- the 25th or -- you know, then it went
 21 through the 28th, so you're not sure which day you
 22 would have told them --
 23 **A It -- it would have been --**
 24 Q -- what information?
 25 **A -- earlier -- earlier calls, I'm sure, but I'm**

1 **not sure which phone call or what -- what anything was**
 2 **stated on which call.**
 3 Q Okay.
 4 **A It's looking like the longer call might have**
 5 **been the one where I talked to a supposed nurse who**
 6 **told me that they had medications there, that I didn't**
 7 **need to worry about bringing any. I don't believe a**
 8 **nurse would have said that. My son obviously didn't**
 9 **get no medication in jail, but that was stated.**
 10 Q Okay. Did you -- were any of these phone
 11 calls phone calls to be able to talk to your son while
 12 he was incarcerated?
 13 **A I don't believe so.**
 14 Q Okay. Did you talk to Treynor at all while he
 15 was incarcerated?
 16 **A No, ma'am. He did not call. My recollection,**
 17 **he did not call.**
 18 Q Okay.
 19 **A No, ma'am.**
 20 Q And while he was incarcerated, did you ever go
 21 visit him there at the county jail?
 22 **A I did not. I didn't I know was allowed to.**
 23 Q Okay. Let's step back for a minute, and we
 24 may come back to these phone records again, but let's
 25 go back to the day that -- that Treynor was arrested.

1 He was charged with sexual assault --
 2 **A Uh-huh.**
 3 Q -- of your younger daughter, --
 4 **A Yes, ma'am.**
 5 Q -- is that right, at the time? And he was
 6 arrested at your residence?
 7 **A He was -- when I got there, they had him over**
 8 **on the side street, I believe it's Sands, I'm not sure**
 9 **of the name of the street, but I believe it's Sands --**
 10 Q Okay.
 11 **A -- or -- I'm not sure of the name.**
 12 Q And when that happened, were you at work at
 13 the time?
 14 **A I was.**
 15 Q Okay. And so did somebody call you to let you
 16 know that this was happening, or --
 17 **A Yes, and I can't remember who it was.**
 18 Q Do you recall what time of day it was?
 19 **A Early morning, midday-ish.**
 20 Q Okay. And so when you got there, what -- what
 21 happened? And, you know, just tell me what was going
 22 on, who was there, what --
 23 **A There was a police officer, two ladies from my**
 24 **daughter's church, my daughter, both my sons, my son**
 25 **was on the back of a cop car. I remember asking**

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1 questions about whether my daughter, who is bipolar,
2 whether she was taking medication, and stuff like that.
3 I sent my youngest son over to get her med box. She
4 had not been taking her medication.

5 I talked to the police officer, and I even
6 asked him a question because he told me -- he said he
7 was going to take him. I was like, "Well, where do you
8 take him?" He said, "To the jail." I was like, "Man,
9 he's 17. He don't belong in no damn jail." He said,
10 "Well, that's where we take 17-year-olds. There's
11 really nothing I can do there."

12 My daughter stayed over there with those
13 two church -- two church ladies. They took her to a
14 SANE exam over at Driscoll, --

15 Q Okay.

16 A -- which was negative.

17 Q Did you talk to Treynor during that time?

18 A I -- very briefly. I opened the door to talk
19 to him, and the cop wouldn't let me talk to him.

20 Q Okay. Do you recall what you said to him, or
21 what was said?

22 A I said, "What's happening?" to the cop, and
23 he -- he didn't answer.

24 Q Okay.

25 A From what I recall, I don't think he answered

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1 anything.

2 Q And then the -- so after that, after -- and
3 then he -- Treynor was taken, as far as you know, I
4 mean, away at that time, and you had no communication
5 with him until, then, you're telling me, when he was
6 released from -- from the county jail?

7 A Yes, ma'am. That's what I recall.

8 Q Okay. So how many days was Treynor
9 incarcerated, from your recollection?

10 A Two to three.

11 Q Okay. During the time he was incarcerated,
12 was there anybody else that you talked to about Treynor
13 and his -- his charges or him being incarcerated in the
14 jail?

15 A State that again.

16 Q Well, specifically did you talk to any
17 attorney about, you know, your son being arrested
18 and -- and being incarcerated?

19 A Did I talk to an attorney?

20 Q Yeah.

21 A Yes, ma'am. Rick -- I can't think of his last
22 name, but --

23 Q Was it Dodd?

24 A -- Dodd -- Dodson, Rick Dodson.

25 Q Okay. Okay.

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1 A And he went and bailed -- not bailed him out,
2 but bonded him out under -- under his name.

3 Q Okay. And do you recall when that was?

4 A I'm not sure. Probably within the first or
5 second day.

6 Q Okay. When did you first get ahold of
7 Mr. Dodson?

8 A Within the first or second day.

9 Q Okay.

10 A I'm not sure of what time.

11 Q Okay. Do you know if Mr. Dodson met with
12 Treynor at the county jail at anytime?

13 A He told me he'd seen him in jail, yes.

14 Q Okay. Do you know when that was?

15 A Not -- not the specific -- specific times, no,
16 ma'am.

17 Q Okay. So, you know, from what you're telling
18 me, the first time you knew anything about what
19 happened with Treynor, was it after he was released, or
20 did you find out anything about these incidents that
21 he's alleging in this lawsuit prior to that?

22 A The first time I -- I knew anything and --
23 when I picked him up from the jail, I waited out there
24 for several hours. He was the last one, or the one
25 that was late to be released. He was all wiry, and

Page 24

1 crazy, and everything else. "Hey, man, how you been?"

2 He goes, "Hey, dad, I got butt fucked in there."

3 That's exactly how he said. I was like, "Did you get
4 any medication?" He goes, "No, dad, I ain't had any
5 medication." I was like, "All right, man. Let's just
6 go get -- get an apple and let's talk about it." It
7 was like 1:30, 2 o'clock in the morning, I recollect.

8 I put him to bed, and he woke up the next
9 morning and had medication for night, gave him his
10 morning medication and waited for a minute and then I
11 was like, "So tell me again what happened in there,"
12 and he told me the whole story, so then that's when I
13 took him to get a SANE exam.

14 Q Okay. We'll come back to talking to
15 Treynor, but I guess I want to go back to you talking
16 to Mr. Dodson, and I guess you hired him to represent
17 Treynor on his criminal charges?

18 A Uh-huh.

19 Q Is that yes, --

20 A Oh, --

21 Q -- just for the record?

22 A -- I'm sorry. Yes, ma'am.

23 Q So you -- at no time did Mr. Dodson talk to
24 you about anything that was happening with Treynor
25 while he was incarcerated, or y'all didn't -- he didn't

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<p>1 tell you anything that he had heard from Treynor, that,</p> <p>2 you know, there had been any sort of incidents in the</p> <p>3 jail?</p> <p>4 A No ma'am. I recall telling Mr. Dodson about</p> <p>5 that stuff.</p> <p>6 Q Okay. So you told Mr. Dodson?</p> <p>7 A Yeah.</p> <p>8 Q Okay. So -- Okay. Did -- getting back to</p> <p>9 when Treynor --</p> <p>10 A And -- and I think the reason why I talked to</p> <p>11 Mr. Dodson is because I had to take him somewhere, and</p> <p>12 I told him that I'm going to take him to Driscoll, and</p> <p>13 then someone, I can't remember his name, said no, that</p> <p>14 I had to take him to Bay Area, and I pretty much told</p> <p>15 him to kiss my ass, that I'm taking him to Driscoll,</p> <p>16 and that's where I took him.</p> <p>17 Q Right.</p> <p>18 Before you took him to Driscoll, did you</p> <p>19 call Dr. Deline, or did you let her know that anything</p> <p>20 had happened?</p> <p>21 A That he was raped?</p> <p>22 Q Yes.</p> <p>23 A I think that was at one of his appointments we</p> <p>24 let her know.</p> <p>25 Q Okay.</p>	<p>1 A Yes. It's -- it's possible. I wasn't paying</p> <p>2 a whole lot of attention to, you know, stuff that</p> <p>3 wasn't really pertinent to the situation.</p> <p>4 Q Okay. So this would have been -- from -- from</p> <p>5 the records I've seen, this -- you took him to Driscoll</p> <p>6 on September 29th, 2016. Does that sound correct, that</p> <p>7 date?</p> <p>8 A Around that date, yes, ma'am.</p> <p>9 Q Okay. And so, I mean, you've already</p> <p>10 mentioned you're not sure about talking to anyone. You</p> <p>11 could have. So you wouldn't remember any specifics</p> <p>12 about what you would have talked to anyone about, what</p> <p>13 happened, or your phone calls, or anyone else's phone</p> <p>14 calls to the jail while Treynor was incarcerated?</p> <p>15 A I -- I called Dr. Deline to ask her to call</p> <p>16 Driscoll for me.</p> <p>17 Q Okay.</p> <p>18 A It had nothing to do with the assault. That</p> <p>19 was just to state, "Hey, he needed to be isolated</p> <p>20 and -- and medicated., --</p> <p>21 Q Okay.</p> <p>22 A -- and she said she would.</p> <p>23 Q Okay. Do you know if she did contact the</p> <p>24 jail?</p> <p>25 A I -- I know that she -- she said she did.</p>
Page 26	Page 28
<p>1 A I'm not -- I -- I can't remember whether I</p> <p>2 asked for her to see him in the SANE exam or not.</p> <p>3 Q Okay.</p> <p>4 A I'm not sure when she got involved in that.</p> <p>5 Q And how regularly would he see Dr. Deline, --</p> <p>6 A Twice.</p> <p>7 Q -- like, prior to this?</p> <p>8 A Twice annually.</p> <p>9 Q Okay. Twice annually?</p> <p>10 A Uh-huh.</p> <p>11 Q Okay. So you took Treynor to Driscoll to have</p> <p>12 the SANE exam, which is a -- an exam for potentially</p> <p>13 being sexually assaulted?</p> <p>14 A Yes, ma'am.</p> <p>15 Q Okay. And do you recall talking to Alyssa</p> <p>16 Porterfield, who's a social worker for Driscoll</p> <p>17 Children's?</p> <p>18 A I'm not sure of that name.</p> <p>19 Q Okay. But do you recall talking to anyone at</p> <p>20 Driscoll, I mean, being interviewed by anyone there,</p> <p>21 a -- a social worker or other staff, a nurse, --</p> <p>22 A It's --</p> <p>23 Q -- about your --</p> <p>24 A -- possible.</p> <p>25 Q -- family dynamics?</p>	<p>1 Q Okay. So you had a subsequent phone</p> <p>2 conversation, like you talked to her once to tell her</p> <p>3 to call, and then after that you talked to her again?</p> <p>4 Is that -- I mean, and she --</p> <p>5 A That's possibly what had happened, yes.</p> <p>6 Q Okay. I guess I'm just -- I'm not trying to</p> <p>7 ask a difficult question. I'm just trying to figure</p> <p>8 out. You just said, you know, she indicated she did</p> <p>9 call. How did you find that out from her? I mean, did</p> <p>10 you see her?</p> <p>11 A It probably was a subsequent call.</p> <p>12 Q Okay.</p> <p>13 A I'm not -- like I said, man, none of this</p> <p>14 stuff was anything I was trying to write down, or</p> <p>15 remember, or --</p> <p>16 Q Sure.</p> <p>17 A -- any of that. I was just trying to get --</p> <p>18 protect my son.</p> <p>19 Q Sure.</p> <p>20 When you first -- when -- I mean, you</p> <p>21 indicated the first thing Treynor said was that he had</p> <p>22 been butt fucked. I mean, his demeanor, can you</p> <p>23 describe for me what --</p> <p>24 A It was matter of fact, just -- just like I'm</p> <p>25 talking to you right here. Just matter of fact. I</p>

Charles Hatcher

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1 mean, I -- I was shocked the way it came out, you know.
 2 Q Uh-huh. Right.
 3 A My -- my first intention, Well, he was in
 4 there with guys, you know, that he's normally not
 5 around, you know, so he heard things, and this and
 6 that, and that's why I wanted to get him on the
 7 medication and find out for sure what was going on with
 8 him.
 9 Q Right.
 10 So are you telling me, because just from
 11 what you just stated, and what you've testified to
 12 earlier about when he's not on his medications he tends
 13 to, you know, get off topic or even, so much as you
 14 said, sort of seems like he's talking a game, you're
 15 telling me maybe at first you thought it wasn't -- it
 16 wasn't true or you didn't know whether to believe him?
 17 A It wasn't so much that. It was just, like I
 18 said, I -- I asked if he'd been on his medications. He
 19 didn't have any in there, so I didn't know.
 20 Q Okay.
 21 A It's 2 o'clock in the morning. He told me he
 22 didn't sleep much, you know, which is pretty common if
 23 he's not on the medication, so I just didn't know, like
 24 I said, until in the morning, and I still didn't know.
 25 I took him and got him examined.

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1 Q Right.
 2 Do you recall anybody else -- or any other
 3 conversations you had while you were at Driscoll
 4 Children's Hospital with Treynor about the incidents in
 5 the jail? Do you recall anything specific?
 6 A At Driscoll?
 7 Q Yes. Yes, sir.
 8 A No, I don't.
 9 Q Okay. After you took Treynor to Driscoll,
 10 did -- did you take him to meet with Dr. Deline, or
 11 were there any other appointments that you had?
 12 A We did have an appointment with Dr. Deline
 13 shortly after that.
 14 Q Okay.
 15 A I'm not sure of the time frame, but --
 16 Q Okay. And was he getting additional
 17 counseling because of the incident?
 18 A He got counseling with -- I'm not sure of her
 19 name, but it was the Child Advocacy Center. He was
 20 seeing a counselor there.
 21 Q Okay. So he was interviewed at the Child
 22 Advocacy Center, right?
 23 A Yes, ma'am.
 24 Q But you're saying he additionally got some
 25 counseling through --

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1 A Yes, ma'am.
 2 Q -- them?
 3 Okay. On a more consistent basis?
 4 A Weekly basis for a while.
 5 Q Okay. Like for how long would you say?
 6 A Until just recently. He started full-time in
 7 college, so he's having trouble getting over there, so
 8 I believe it was -- last month was his last session.
 9 Q Okay. So a little over a year, or about a
 10 year?
 11 A Yes, ma'am.
 12 Q Okay. And you don't remember the name of the
 13 counselor?
 14 A No, I don't.
 15 Q But it's someone at CAC?
 16 A Uh-huh.
 17 Q Okay. And it's a female?
 18 A Yes.
 19 Q Okay. Treynor mentioned that he had a journal
 20 and -- and made some notes after the incident happened
 21 and he was staying at who -- who he describe as his
 22 uncle and aunt.
 23 A Yes.
 24 Q I think it's Bob Griffin and --
 25 A And Blaire.

Page 32

1 Q -- Blaire Griffin and Barbara?
 2 A Uh-huh.
 3 Q Do you have that -- those journal entries or
 4 notes that he --
 5 A I do not.
 6 Q -- wrote down?
 7 A He might have them, though.
 8 Q Okay. But you do not?
 9 A No.
 10 Q Okay. And you don't know where they might be,
 11 or --
 12 A No.
 13 Q -- would they exist?
 14 A I know they exist. I asked him to start
 15 writing that stuff down. I -- I did not want to read
 16 it.
 17 Q Okay. Okay. When you say that you talked to
 18 Dr. Deline about calling the jail, you indicated the
 19 two things that she was calling the jail about were
 20 that he had medications he needed to take and that, I
 21 guess, he had Asperger's. Is that what you understood
 22 she talked to the jail about?
 23 A I have no clue what she talked to the jail
 24 about. I just asked her to call.
 25 Q Okay. Why did you think that it would be

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1 better if Treynor was placed in isolation while
 2 incarcerated?
 3 **A Because of the type of people that are in the**
 4 **jail.**
 5 **Q And so you thought he would be preyed upon,**
 6 **or --**
 7 **A Pretty much, yes.**
 8 **Q Yeah. Because of his --**
 9 **A Being 17, being a skinny blond kid, being**
 10 **auti -- autistic, not -- not supposed to be in there,**
 11 **period. I knew that, nobody else knew that, except**
 12 **Dr. Deline, obviously.**
 13 **Q Right. I guess -- nobody else knew what?**
 14 **That -- what do you mean by that?**
 15 **A That he didn't belong in there. I mean, the**
 16 **damn police officer come and took him, told me he's**
 17 **taking him to a regular jail at 17. I'm like, "Hey,**
 18 **man, he's autistic." You know, I pleaded with him. I**
 19 **guess his hands were tied. You call the jailhouse,**
 20 **those people were rude, curt, and they didn't give a**
 21 **shit, you know, every call you made, and as a parent,**
 22 **you know, you are trying to protect your -- your child,**
 23 **and that's all you got every time you turned around.**
 24 **Q Uh-huh.**
 25 **A So I called Dr. Deline, maybe she could do**

1 **something. I'm a nobody, she's a doctor.**
 2 **Q And the earliest, I mean, you were able to get**
 3 **the attorney Dodson, I guess you said he was the one**
 4 **who bonded your son out?**
 5 **A Yes.**
 6 **Q But you weren't able to get him out any sooner**
 7 **than -- than that? I mean, were you aware of what his**
 8 **bond status was, or were you told any of that?**
 9 **A This is hard to recollect, but I remember Rick**
 10 **bonded him out and he chose not to come out on the**
 11 **bond, and I called Rick, and that's when Rick went to**
 12 **talk to him. I was like, "Hey, man, did you bond him**
 13 **out?" He goes, "Yeah, I posted it here." I was like,**
 14 **"They're telling me that he's not getting out, and**
 15 **they didn't tell me why," and Rick called back and**
 16 **said, "Well, he wanted to stay in there," so he talked**
 17 **him out -- about coming back out.**
 18 **Q Did you understand why? I mean, were you --**
 19 **did Mr. Dodson explain to you why Treynor said he**
 20 **didn't want to come out?**
 21 **A I believe it was something to do with being**
 22 **scared.**
 23 **Q Did that make sense to you? I mean --**
 24 **A That's my whole point of calling the jail. He**
 25 **didn't belong in there because he does things that**

1 **don't make sense.**
 2 **Q Okay.**
 3 **A So, yes, it made sense to me. It wouldn't**
 4 **make sense to nobody else.**
 5 **Q Okay. Mr. Hatcher, I am trying to set a**
 6 **timeline --**
 7 **A Hold on.**
 8 **Q Oh, I'm sorry.**
 9 **MR. GALE: You weren't in here, but he's**
 10 **got an emergency. His son is in Driscoll.**
 11 **Q (By Ms. Cron) I'm just trying to, you know,**
 12 **set a timeline because Treynor was in the jail over,**
 13 **you know, these few days, and -- and, you know, we've**
 14 **gone over it with the phone records. I guess I'm --**
 15 **I'm hoping to get a better idea of -- of when, if at**
 16 **all, you can recall at what point, you know, whether it**
 17 **was the first day, the second day, you know, when you**
 18 **contacted Dr. Deline about calling the jail, if you**
 19 **can, you know, think through that and -- and tell me,**
 20 **you know, was it you, you know, after you had contacted**
 21 **the jail several times and it was the following day? I**
 22 **mean --**
 23 **A It will be in the phone records, ma'am. I**
 24 **mean, I used the same phone.**
 25 **Q Okay. So her --**

1 **A So I --**
 2 **Q -- her phone number should be --**
 3 **A -- I called Driscoll, they called her and then**
 4 **she called me back, so it will -- it will all be in the**
 5 **record there.**
 6 **MS. CRON: Okay. Okay. All right. I**
 7 **have no further questions.**
 8 **MR. GALE: Okay. We'll reserve.**
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Charles Hatcher

10 (37 - 40)

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1 CHANGES AND SIGNATURE

2 WITNESS NAME: DATE OF DEPOSITION

3 PAGE LINE CHANGE FROM/CHANGE TO REASON

4 _____

5 _____

6 _____

7 _____

8 _____

9 _____

10 _____

11 _____

12 _____

13 _____

14 _____

15 _____

16 _____

17 _____

18 _____

19 _____

20 _____

21 I declare under penalty of perjury

22 that the foregoing is true and correct.

23

24 CHARLES HATCHER, Witness

25 Deposition date: 11/16/17

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1 I, CHARLES HATCHER, have read the foregoing

2 deposition and hereby affix my signature that same is

3 true and correct, except as noted above.

4

5

6 CHARLES HATCHER _____

7

8 THE STATE OF _____)

9 COUNTY OF _____)

10 Before me, REBECCA A. HINOJOSA, on this

11 day personally appeared CHARLES HATCHER, known to me

12 (or proved to me under oath or through _____

13 (description of identity card or other document) to be

14 the person whose name is subscribed to the foregoing

15 instrument and acknowledged to me that they executed

16 the same for the purposes and consideration therein

17 expressed.

18 Given under my hand and seal of office

19 _____ day of _____, 2017.

20

21

22 NOTARY PUBLIC IN AND FOR _____

23 THE STATE OF _____

24 MY COMMISSION EXPIRES: _____

25

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1 IN THE UNITED STATES DISTRICT COURT

2 SOUTHERN DISTRICT OF TEXAS

3 CORPUS CHRISTI DIVISION

4 TREYNOR HATCHER *

5 VS. * CA NO. 2:17-CV-155

6 NUECES COUNTY, TEXAS, et al. *

7

8 REPORTER'S CERTIFICATE

9 ORAL DEPOSITION OF TREYNOR HATCHER

10 November 16, 2017

11

12 I, REBECCA A. HINOJOSA, a Certified

13 Shorthand Reporter in and for the State of Texas,

14 hereby certify to the following:

15 That the witness, CHARLES HATCHER, was

16 duly sworn by the officer and that the transcript of

17 the oral deposition is a true record of the testimony

18 given by the witness;

19 I further certify that pursuant to FRCP

20 Rule 30(f)(1) that the signature of the deponent:

21 _____ was requested by the deponent

22 or a party before the completion of the deposition and

23 returned within 30 days from date of receipt of the

24 transcript. If returned, the attached Changes and

25 Signature Page contains any changes and the reasons

Page 40

1 _____ was not requested by the deponent or

2 a party before the completion of the deposition.

3 I further certify that I am neither

4 attorney nor counsel for, related to, nor employed by

5 any of the parties to the action in which this

6 testimony was taken.

7 Further, I am not a relative or employee

8 of any attorney of record in this cause, nor do I have

9 a financial interest in the action.

10 Subscribed and sworn to on the the 30th

11 day of November, 2017.

12

13

14

15 REBECCA A. HINOJOSA, CSR

16 Certification No.: 3937

17 Expiration Date: 12/31/2018

18 Firm Registration No. 644

19 LEXITAS

20 615 N. Upper Broadway, Ste. 1450

21 Corpus Christi, Texas 78401

22

23

24

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Charles Hatcher

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1 IN THE UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF TEXAS
3 CORPUS CHRISTI DIVISION

3 TREYNOR HATCHER

*

*

4 VS.

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CA NO. 2:17-CV-155

*

5 NUECES COUNTY, TEXAS, et al. *

6 REPORTER'S CERTIFICATE
7 ORAL DEPOSITION OF TREYNOR HATCHER

8 November 16, 2017

9
10 I, REBECCA A. HINOJOSA, a Certified
11 Shorthand Reporter in and for the State of Texas,
12 hereby certify to the following:

13 That the witness, CHARLES HATCHER, was
14 duly sworn by the officer and that the transcript of
15 the oral deposition is a true record of the testimony
16 given by the witness;

17 I further certify that pursuant to FRCP
18 Rule 30(f)(1) that the signature of the deponent:

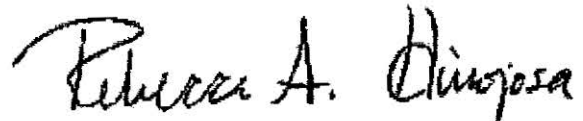
19
20 _____ was requested by the deponent
21 or a party before the completion of the deposition and
22 returned within 30 days from date of receipt of the
23 transcript. If returned, the attached Changes and
24 Signature Page contains any changes and the reasons
25 therefor:

1 _____ was not requested by the deponent or
2 a party before the completion of the deposition.

3 I further certify that I am neither
4 attorney nor counsel for, related to, nor employed by
5 any of the parties to the action in which this
6 testimony was taken.

7 Further, I am not a relative or employee
8 of any attorney of record in this cause, nor do I have
9 a financial interest in the action.

10 Subscribed and sworn to on the the 30th
11 day of November, 2017.

12 
13
14

15 _____
16 REBECCA A. HINOJOSA, CSR
17 Certification No.: 3937
Expiration Date: 12/31/2018
Firm Registration No. 644

18 LEXITAS
19 615 N. Upper Broadway, Ste. 1450
20 Corpus Christi, Texas 78401
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CHANGES AND SIGNATURE

WITNESS NAME: DATE OF DEPOSITION

PAGE LINE CHANGE FROM/CHANGE TO REASON

I declare under penalty of perjury
that the foregoing is true and correct.

CHARLES HATCHER, Witness
Deposition date: 11/16/17

1 I, CHARLES HATCHER, have read the foregoing
 2 deposition and hereby affix my signature that same is
 3 true and correct, except as noted above.

4

5

6

CHARLES HATCHER

7

8 THE STATE OF _____)
 9 COUNTY OF _____)

10 Before me, REBECCA A. HINOJOSA, on this
 11 day personally appeared CHARLES HATCHER, known to me
 12 (or proved to me under oath or through _____
 13 (description of identity card or other document) to be
 14 the person whose name is subscribed to the foregoing
 15 instrument and acknowledged to me that they executed
 16 the same for the purposes and consideration therein
 17 expressed.

18 Given under my hand and seal of office
 19 _____ day of _____, 2017.

20

21

NOTARY PUBLIC IN AND FOR
 22 THE STATE OF _____
 23 MY COMMISSION EXPIRES: _____

24

25

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